

Arjun Vasan
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Plaintiff in Pro Per

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

Arjun Vasan,
Plaintiff,
vs.
Checkmate.com, Inc.,
(dba "Checkmate"),
Defendant.

Case No.: 2:25-cv-00765-MEMF-JPR
Hon. Maame Ewusi-Mensah Frimpong

**DECLARATION OF ARJUN VASAN
REGARDING DELAYED DISCHARGE
FROM INPATIENT MEDICAL CARE**

Hearing Date: September 18, 2025
Hearing Time: 10am
Complaint Filed: January 28, 2025

I, Arjun Vasan, declare as follows:

1. I am the Plaintiff in this action, appearing pro se.
2. On July 10, 2025, I was unexpectedly hospitalized due to an acute medical condition. I promptly informed opposing counsel of my circumstances, and the parties stipulated to a nine-day extension for my response.

- 1 3. Unfortunately, my hospitalization and recovery extended longer than anticipated; I was
2 discharged only on August 4, 2025, and regained full access to my records and computer
3 on that date.
- 4 4. While under treatment, I worked diligently and in good faith—albeit on a limited
5 schedule—to prepare and file this motion to dismiss. Now fully recovered, I am
6 submitting this motion at the earliest possible time following my discharge, in order to
7 comply with the extended deadline graciously stipulated to by opposing counsel, for
8 which I am sincerely appreciative.
- 9 5. Never missing a deadline—despite handling two federal cases simultaneously—has
10 always been and remains a point of pride for me. In light of these circumstances, I
11 respectfully request leave to file any necessary corrections or supplemental materials by
12 11:59 p.m. on August 8, 2025, and stipulate to an equivalent two-day extension for
13 Defendant to respond to any amendment or supplement, so that Defendant will suffer no
14 prejudice as a result of this request.
- 15 6. No party will be prejudiced by this request, as I do not anticipate introducing any new
16 evidence not on the record in this or the related Southern District of New York case.
- 17 7. The primary arguments raised in this motion were previously briefed in connection with
18 Checkmate’s SDNY complaint, which forms the basis of their counterclaims here. The
19 present motion updates and adapts those arguments in light of this Court’s prior order, the
20 law of the case, and the controlling authority of the Ninth Circuit.
- 21 8. Should the Court require further substantiation, I am prepared to provide a medical
22 certification of my hospitalization from July 10, 2025, to my discharge on August 4 as
23 part of any supplemental or amended filing submitted on or before August 8, 2025.
- 24 9. I will file my [Proposed] Order and Request for Judicial Notice by the same date.

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26
27 *I Declare under Penalty of Perjury under the laws of the United States and the State of*
28 *California that the foregoing is True and Correct.*

Respectfully Submitted,

Executed on: August 06, 2025

In Cerritos, Ca

/s/ *Arjun Vasana*

By: _____

Arjun Vasana
Plaintiff In Pro Per